BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORIES
(NNA/USPS-T1-1(a) AND (c) [ERRATA]

The United States Postal Service hereby files the revised responses of witness

David Williams to the above-listed interrogatories of the National Newspaper

Association. The original responses were filed on March 15, 2012 and are superseded

by the revised responses filed today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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NNA/USPS-T1-1

Please refer to your response to GCA/USPS T1-1, where you stated:
"The Critical Entry Times (CETs) for Periodicals Flats were
modified to conform the service standard requirement of this mail class
with the processing requirements in an Flats Sequencing System (FSS)
environment in May of 2011."

a. Is the intention to sort Periodicals Flats on FSS machines the sole driving factor in changes in CETs? If not, please list other factors.

b. Do transportation schedules also affect CETs?

c. Are you aware of any facilities where newspaper Periodicals or Standard mail is sorted on the FSS machines? If so, please list the facilities.

RESPONSE

a. No, the driving factor that led to the changes in CETs was to align process

capability to the required bundle and piece processing of flat volume.

b. They may.

c. All FSS sites process automation-compatible Periodicals and Standard. If

the volumes you are referencing in your question are automation

compatible they will be sorted on FSS machines.